

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPH THOMAS AND JOANNE THOMAS, H/W	:	
	:	CIVIL ACTION
V.	:	
	:	
ABX AIR, INC.; AND PAC NATIONAL	:	
	:	NO. 02-3269
V.	:	
	:	
MEESE, INC.; TRI-LINK TECHNOLOGIES, LTD.; AND GRANGER INDUSTRIES, INC.	:	

**CROSSCLAIM OF THIRD PARTY DEFENDANT MEESE, INC.
AGAINST DEFENDANTS ABX AIR, INC. AND PAC NATIONAL AND
THIRD PARTY DEFENDANTS TRI-LINK TECHNOLOGIES, LTD
AND GRANGER INDUSTRIES, INC.**

1. For purposes of this Crossclaim, the averments of fact and averments of fault and liability set forth in Plaintiffs' Complaint and the Third Party Complaint otherwise at issue as set forth above are incorporated herein.

2. If it is judicially determined that the Plaintiffs have the right to recover damages, same being denied, then such recovery should be effected only against the Defendants, ABX Air, Inc. and PAC National and Third Party Defendants, Tri-Link Technologies, Ltd. and Granger Industries, Inc., and in the event of a judgment for Plaintiffs and against the Third Party Defendant and Crossclaimant, Meese, Inc., said Third Party Defendant is entitled to and request judgment against the Defendants, ABX Air, Inc. and PAC National, and Third Party Defendants, Tri-Link Technologies, Ltd. and Granger Industries, Inc., for contribution and indemnification.

WHEREFORE, Third Party Defendant, Meese, Inc., respectfully requests judgment in its favor and against the Plaintiffs and in regard to its Crossclaim respectfully requests judgment in its favor and against the Defendants, ABX Air, Inc. and PAC National, and Third Party Defendants, Tri-Link Technologies, Ltd. and Granger Industries, Inc., for contribution or indemnification.

MARGOLIS EDELSTEIN

BY: WALTER J. TIMBY, III, ESQUIRE
Attorney for Third Party Defendant
Meese, Inc.
Identification No. 23894
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VERIFICATION

Walter J. Timby, III, Esquire, states that he is the attorney for Meese, Inc., Third Party Defendant herein; that he is acquainted with the facts set forth in the foregoing Counterclaim against Third Party Plaintiff ABX Air, Inc.; that the same are true and correct to the best of his knowledge, information and belief, and that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

WALTER J. TIMBY, III, ESQUIRE

Dated:

CERTIFICATE OF SERVICE

I, WALTER J. TIMBY, III, ESQUIRE, hereby certify that a true and correct copy of Third Party Defendant's Counterclaim against Third Party Plaintiff ABX Air, Inc., was sent to all parties, via United States mail, postage pre-paid, on April 15, 2003.

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